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April 14, 2023

**Hines v Lanigan et al**  
**Case Number: 17-cv-02864-NLH-MJS**

Dear Mag. Judge Skahill,

I hope this letter finds you well. As ordered by the Court on March 31, 2023, ECF #121, below is the list defendants whom Plaintiff wishes to depose:

**DEFENDANT**

- 1) NJDOC by way of 30b6, regarding Plaintiff' ADA claims and 8<sup>th</sup> Amendment claims contained in Count 2. We may be satisfied with the NJDOC ADA coordinator, if there is one.
- 2) Lanigan, regarding Count 2 – Defendants have advised they will resist such a deposition, based on lack of knowledge. Plaintiff believes he may be able to avoid deposing Lanhgigan after the 30b6 deposition.
- 3) Waters
- 4) Marin
- 5) Jackson
- 6) L. Smith
- 7) McNear

Unfortunately, as the Court may be aware, this past week has been the Jewish holiday of Passover, and I am still working on finalizing dates with Mr. Freeman. We hope to have them all scheduled by April 21, 2023, at which time I will supplement this letter with dates.

Plaintiff is scheduled to be deposed on April 28, 2023.

Respectfully,

/s/ Solomon M. Radner  
Solomon M. Radner